

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

REBECCA BROOKS; et. al,

*Plaintiffs,*

v.

THOMAS MAHONEY, III, in his capacity  
as Chairman of the Chatham County Board of  
Elections; et. al,

*Defendants.*

No. 4:20-cv-00281-RSB

**DECLARATION OF MELVIN IVEY**

Pursuant to 28 U.S.C. § 1746, I, Melvin Ivey, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am the President of the Augusta Branch of the Georgia State Conference of the National Association for the Advancement of Colored People. I have been a member of the Georgia NAACP for many years. I live in the Hephzibah area of Augusta-Richmond County.
4. I am a Pastor at the Greater Saint John Baptist Church in Augusta. I am retired from the United States Postal Service, where I worked for many years.
5. I am registered to vote in Augusta-Richmond County.
6. I voted by mail in the November 2020 election.
7. I did not vote in person during the COVID-19 pandemic because I am over 65 years old and I was concerned about the risk of contracting COVID while voting in person.

8. Prior to the November 2020 election, I completed a mail ballot application and submitted it to the Richmond County Board of Elections. Once I received my mail ballot, I completed it, and placed it in a mail ballot drop box approximately three to four weeks before Election Day, during October of 2020.

9. That ballot included a vote in the November 2020 presidential contest.

10. Afterwards, but prior to Election Day, I checked the Georgia My Voter Page, [www.mvp.sos.ga.gov](http://www.mvp.sos.ga.gov), and confirmed that the Richmond County Board of Elections had received my mail ballot.

11. My understanding is that my vote in the November 2020 presidential contest in Augusta-Richmond County would be invalidated if the Plaintiffs in this case are successful.

12. I and other members of the Augusta Branch of the NAACP are at risk of being disenfranchised if the presidential election results in Augusta-Richmond County are invalidated.

13. The Augusta Branch of the NAACP conducts voter registration, education, and turnout efforts. The Augusta Branch actively encouraged voter participation in the November 2020 election and is now focusing on registering voters and getting out the vote for the upcoming runoff election.

14. The Augusta Branch of the NAACP developed messaging and materials regarding voting by mail and voting in person, both during the early voting period and on Election Day, for the November 2020 election. For example, members of the Augusta Branch of the NAACP helped distribute information about the early voting locations and absentee ballot drop boxes available in Augusta-Richmond County.

15. The Augusta Branch of the NAACP has an interest in preventing the disenfranchisement of eligible voters who properly cast ballots, including its members and voters

it may have assisted with navigating the voting process. The efforts of members of the Augusta Chapter of the NAACP to encourage, register, educate, and assist voters in the November 2020 election would be thwarted if the results of the presidential election were invalidated.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13 day of November, 2020 in Augusta, Georgia.

Melvin Ivey  
Rev. Melvin Ivey